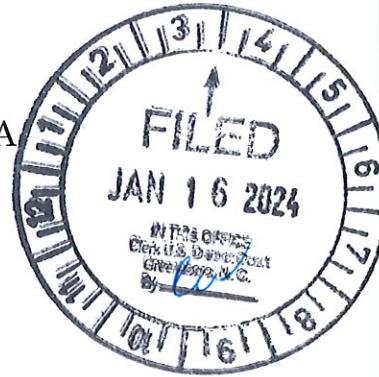


SEALED

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA



UNITED STATES OF AMERICA

v.

JOSE ALFREDO AVILA	:	1:24CR <u>5</u> -1
HAISEL DAILY	:	1:24CR <u>5</u> -2
RUBEN MATIAS NICOLOPULOS SILVA	:	1:24CR <u>5</u> -3
NATHAN NOEL QUINTANA	:	1:24CR <u>5</u> -4
JESUS MANUEL SANTIAGO, III	:	1:24CR <u>5</u> -5
DEANGELO LEE CONTRERAS	:	1:24CR <u>5</u> -6
TRISTIAN RENE GAMEZ	:	1:24CR <u>5</u> -7
VICTOR GONZALEZ	:	1:24CR <u>5</u> -8
JESUS SALAZAR	:	1:24CR <u>5</u> -9
CRISTIAN VALDEZ	:	1:24CR <u>5</u> -10
JESUS GERARDO VALDEZ, JR.	:	1:24CR <u>5</u> -11

The Grand Jury charges:

COUNT ONE
(Kidnapping Conspiracy)

1. From in or about August 2022, continuing up to and including in or about July 2023, in the County of Durham, in the Middle District of North Carolina, and elsewhere, Jarod Gabriel Seemungal, Remy Ra St Felix, Elmer Ruben Castro, JOSE ALFREDO AVILA, HAISEL DAILY, RUBEN MATIAS NICOLOPULOS SILVA, NATHAN NOEL QUINTANA, JESUS MANUEL SANTIAGO, III, DEANGELO LEE CONTRERAS, TRISTIAN RENE GAMEZ,

VICTOR GONZALEZ, JESUS SALAZAR, CRISTIAN VALDEZ, JESUS GERARDO VALDEZ, JR., and divers others, both known and unknown to the Grand Jury, did unlawfully, willfully, and knowingly combine, conspire, confederate, and agree with each other, and with other persons, to unlawfully seize, confine, kidnap, abduct, and carry away, and hold for ransom and reward and benefit any person, and travel in interstate commerce and use means, facilities, and instrumentalities of interstate and foreign commerce in committing and in furtherance of the commission of the offense.

2. In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt acts, among others, were committed in the Middle District of North Carolina and elsewhere:

a. On or about September 12, 2022, Remy Ra St Felix, JOSE ALFREDO AVILA, and NATHAN NOEL QUINTANA detained Victim-1 and Victim-2 at gunpoint in the victims' home in Delray Beach, Florida.

b. On or about September 15, 2022, Remy Ra St Felix, together with others, detained Victim-3 at gunpoint in the victim's home in Homestead, Florida and then forced Victim-3 into a car and drove him to Stuart, Florida.

c. In or about early October 2022, Remy Ra St Felix, JOSE ALFREDO AVILA, NATHAN NOEL QUINTANA, and JESUS MANUEL SANTIAGO, III, traveled from Florida to the area of Little Elm, Texas.

d. In or about early November 2022, Remy Ra St Felix and JESUS MANUEL SANTIAGO, III, together with at least one other, traveled from Florida to the area of Little Elm, Texas.

e. In or about late November 2022, Remy Ra St Felix and JESUS MANUEL SANTIAGO, III, together with others, attempted to travel from Florida to the area of Little Elm, Texas.

f. In or about December 2022, Jarod Gabriel Seemungal and HAISEL DAILY traveled from Florida to the area of Little Elm, Texas.

g. On or about December 22, 2022, DEANGELO LEE CONTRERAS, JESUS SALAZAR, JESUS GERARDO VALDEZ, JR., CRISTIAN VALDEZ, and VICTOR GONZALEZ detained Victim-4, Victim-5, Victim-6, and Victim-7 at gunpoint in the victims' home in Little Elm, Texas.

h. On or about April 8, 2023, Remy Ra St Felix and Elmer Ruben Castro traveled from Florida to Durham, North Carolina.

i. On April 11, 2023, Elmer Ruben Castro, accompanied by Remy Ra St Felix, purchased a clipboard, reflective safety vest, sunglasses, and one pair of khaki pants at a Walmart in Durham, North Carolina.

j. Between April 8, 2023, and April 12, 2023, Remy Ra St Felix and Elmer Ruben Castro surveilled the home of Victim-8 and Victim-9.

k. On or before April 12, 2023, Remy Ra St Felix obtained an image of Victim-8's driver's license.

l. On or about April 12, 2023, Remy Ra St Felix and Elmer Ruben Castro detained Victim-8 and Victim-9 at gunpoint in the victims' home in Durham, North Carolina.

m. On or about July 24, 2023, Remy Ra St Felix, together with at least one other, traveled from Florida to the area of East Meadow, New York.

All in violation of Title 18, United States Code, Section 1201(c).

COUNT TWO
(Hobbs Act Robbery Conspiracy)

3. From in or about August 2022, continuing up to and including in or about July 2023, in the County of Durham, in the Middle District of North Carolina, and elsewhere, Jarod Gabriel Seemungal, Remy Ra St Felix, Elmer Castro, JOSE ALFREDO AVILA, HAISEL DAILY, RUBEN MATIAS NICOLOPULOS SILVA, NATHAN NOEL QUINTANA, JESUS MANUEL SANTIAGO, III, DEANGELO LEE CONTRERAS, TRISTIAN RENE GAMEZ, VICTOR GONZALEZ, JESUS SALAZAR, CRISTIAN VALDEZ, JESUS GERARDO VALDEZ, JR., and divers others, both known and unknown to the Grand Jury, did unlawfully, willfully, and knowingly conspire, combine, confederate and agree with each other, and with other persons, to unlawfully obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States

Code, Section 1951(b)(1); in violation of Title 18, United States Code, Section 1951(a).

FORFEITURE ALLEGATION

4. The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C), Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c).

5. Upon conviction of one or both of the offenses charged in Counts One and Two of this Indictment, the defendants, JOSE ALFREDO AVILA, HAISEL DAILY, RUBEN MATIAS NICOLOPULOS SILVA, NATHAN NOEL QUINTANA, JESUS MANUEL SANTIAGO, III, DEANGELO LEE CONTRERAS, TRISTIAN RENE GAMEZ, VICTOR GONZALEZ, JESUS SALAZAR, CRISTIAN VALDEZ, JESUS GERARDO VALDEZ, JR. shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to such offense, or a conspiracy to commit such offense.

6. Upon conviction of the offense alleged in Count Two of this Indictment, the defendants, JOSE ALFREDO AVILA, HAISEL DAILY, RUBEN MATIAS NICOLOPULOS SILVA, NATHAN NOEL QUINTANA, JESUS MANUEL SANTIAGO, III, DEANGELO LEE CONTRERAS, TRISTIAN RENE GAMEZ, VICTOR GONZALEZ, JESUS SALAZAR,

CRISTIAN VALDEZ, JESUS GERARDO VALDEZ, JR., shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d), all right, title and interest in and to any firearms or ammunition involved in or used in the commission of the offense.

7. The property to be forfeited may include, but is not limited to, a money judgment in an amount to be determined, representing the value of the property subject to forfeiture as a result of such offense.

8. If any of the property described above as being subject to forfeiture as a result of any act or omission of the defendant cannot be located upon the exercise of due diligence, has been transferred or sold to or deposited with a third person, has been placed beyond the jurisdiction of the Court, has been substantially diminished in value, or has been commingled with other property which cannot be divided without difficulty, it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All pursuant to Title 18, United States Code, Sections 981(a)(1)(C), Title 18, United States Code, Section 924(d), Rule 32.2, Federal Rules of Criminal Procedure, and Title 28, United States Code, Section 2461(c).

DATED: January 16, 2024

SANDRA J. HAIRSTON
United States Attorney



BY: ERIC L. IVERSON
Assistant United States Attorney

A TRUE BILL:

FOREPERSON